

Tom W. Sharp, ID #00791643
BLALACK & WILLIAMS, P.C.
5550 LBJ Freeway, Suite 400
Dallas, TX 75240
214/630-1916; 214/630-1112 (fax)
Attorneys for United Heritage Credit Union

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
(HOUSTON DIVISION)

IN RE:)	
)	CASE NO. 10-40579
DAVID MOORE AND LISA MOORE)	
Debtor(s))	Hearing Date: March 29, 2011
)	Hearing Time: 3:30 p.m.

OBJECTION TO CONFIRMATION OF DEBTOR'S CHAPTER 13 PLAN

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES UNITED HERITAGE CREDIT UNION, the holder of a claim in the above numbered and entitled case and files this, its Objection to Confirmation of Debtor's Proposed Chapter 13 Bankruptcy Plan, and as grounds therefor would respectfully show the Court as follows:

1. This Court has jurisdiction over this matter by virtue of the jurisdiction conferred upon it under 28 U.S.C. § 157 which characterizes this matter as a "core proceeding" arising in a case under Title 11.

2. This creditor is the holder of a claim in this case. The Debtor, whether one or more, is indebted to Movant as follows: \$12,085.87

3. Securing repayment of the above described indebtedness, Debtor gave this creditor a security interest in One (1) 2007 Summerland 2950 BH, ID 4YDT2952375150233 which retains the following retail value: \$11,995.00, pursuant inspection by Movant

4. The Plan as proposed by the Debtor fails to meet the provision of 11 U.S.C. §1325(a)(3) of the United States Bankruptcy Code and has not been proposed in good faith. Movant would show the Court as follows: (a) The Debtor has proposed to pay less than the replacement value to which Movant is entitled. In that regard, the Debtor has proposed to pay a value of only \$4,000.00. Based upon Movant's own inspection of the collateral, Movant submits that the replacement value is no less than \$11,995.00.

WHEREFORE, Movant prays that this Court deny the confirmation of Debtor's Plan as proposed unless and until Debtor modifies such Plan to correct the deficiencies cited herein. Further, Movant prays for such other and further relief to which Movant may show itself justly entitled.

Respectfully submitted,

BLALACK & WILLIAMS, P.C.
Attorneys for United Heritage Credit Union

By: /s/ Tom W. Sharp
Tom W. Sharp, ID #00791643
5550 LBJ Freeway, Suite 400
Dallas, TX 75240
214/630-1916; 214/630-1112 (fax)

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was served upon David Moore and Lisa Therese Moore, Debtor(s), 25566 Bradbury, Hockley, TX 77447; Alexander B. Wathen, Attorney at Law, Wathen & Associates, 10333 Northwest Freeway, Ste. 503, Houston, TX 77092; David G. Peake, Chapter 13 Trustee, 9660 Hillcroft, Ste. 430, Houston, TX 77096-3856; and upon U.S. Trustee, Office of the U.S. Trustee, 515 Rusk Ave., Ste. 3516, Houston, TX 77002, and upon the parties listed below, all by first class mail, address correction requested or e-mail, on this 7th day of March, 2011.

/s/ Tom W. Sharp

Tom W. Sharp

Parties Requesting Notice:

American Home Mortgage Servicing, Inc.
1525 S. Beltline Rd., Ste. 100 N
Coppell, TX 75019

Lisa BUSHMAN
c/o Ronald H. Tonkin
Attorney at Law
2777 Allen Pkwy., Ste. 1080
Houston, TX 77019